

REMARKS

Claims 1-20, 22-25 and 27-29 are currently pending in the subject application and are presently under consideration. Claims 1, 19 and 29 have been amended as shown on pages 2-5 of the Reply. Entry of the herein amendments is respectfully requested since they do not add any new matter and, therefore, do not require new search or undue consideration.

Favorable reconsideration of the subject patent application is respectfully requested in view of the comments and amendments herein.

I. Rejection of Claims 1-7, 9-20, 22-25 and 27-29 Under 35 U.S.C. §103(a)

Claims 1-7, 9-20, 22-25 and 27-29 stand rejected under 35 U.S.C. §103(a) as being unpatentable over US Patent 5,999,933 issued to Abhay Mehta (hereinafter “Mehta”) in view of US Publication Number 2003/0172046 issued to Zachariah Scott (hereinafter “Scott”). Withdrawal of this rejection is requested for at least the following reasons. Mehta and Scott either alone or in combination, fail to teach or suggest all features of the subject claims.

To reject claims in an application under §103, an examiner must establish a *prima facie* case of obviousness. A *prima facie* case of obviousness is established by a showing of three basic criteria. First, there must be some suggestion or motivation, either in the references themselves or in the knowledge generally available to one of ordinary skill in the art, to modify the reference or to combine reference teachings. Second there must be a reasonable expectation of success. Finally, **the prior art reference (or references when combined) must teach or suggest all the claim limitations.** See MPEP §706.02(j). The teaching or suggestion to make the claimed combination and the reasonable expectation of success must be found in the prior art and not based on the applicant's disclosure. See *In re Vaeck*, 947 F.2d 488, 20 USPQ2d 1438 (Fed. Cir. 1991). (emphasis added).

Applicant's claimed invention relates to systems and methods that map industrial device data structures to database tables that can be accessed *via* a standard database interface. To this end, independent claim 1 recites a system that facilitates data exchange with industrial devices *via* a standard database connection, comprising a mapping component that represents data stored within an industrial device as a database table and an *intelligence component that facilitates*

generating and mapping data to the at least one database table by determining when, how and which data structures should be transformed to corresponding database tables. Mehta and Scott are both silent regarding such novel aspects of the claimed invention.

Mehta discloses mechanisms for analyzing memory dumps. The system collects data structures in a memory dump into logical tables. Collecting data structures into logical tables provides a standard database management system for operating on the logical tables to determine the cause of crash of a hardware/software system for which the memory dump was taken. The Examiner concedes that Mehta does not teach all limitations recited in the subject independent claims, and attempts to cure the deficiencies of Mehta with Scott. However, Scott merely relates to managing devices via a database application interface and allows an application program to treat a device as if it were a relational database, through which database operation requests translate to actual device management commands; and this reference does not make up for the aforementioned deficiencies of Mehta.

At page 3 and 5 of the Final Office Action, the Examiner incorrectly asserts that Mehta substantially teaches *an intelligence component that facilitates generating and mapping data to the at least one database table and determines when, how and which data structures should be transformed to corresponding database tables.* Applicant's representative avers to contrary.

The Office Action cites multiple sections of the reference (Mehta) in support of such contention. The cited reference provides for creating logical tables from information in the memory dump. Data structures, such as a linked list of process control blocks are mapped onto a logical table (Column 5, lines 46-50). The other section of the reference provides a database management system, a template library, and an extraction logic specifier. The extraction software generates the extraction table from information stored in the template library and is managed by the standard database management system (Column 3, lines 1-10). The standard database management system is used to operate on the logical tables for analyzing the memory dump. The database management system provides the ability to join logical tables that contain at least one column that is identical to all tables, in a relational database. Combining data structures in a memory dump into a relational database greatly simplify an analyst's task of analyzing crashes (Column 6, lines 35-52). Hence Mehta provides for only mapping of data structures, such as a linked list of process control blocks onto a logical table, *but does not contemplate employing an intelligence component to facilitate generating and mapping data to the at least one database*

table. Each row in the logical table is dedicated to a single process and simply contains the process identification number, the priority of the process, the run time of the process and the number of files open. The database management system is used to join these logical tables which have one column identical to all tables. Nowhere Mehta teaches or suggests employing an intelligence component to determine when, how and which data structures should be transformed to corresponding database tables and facilitating generating and mapping data to the at least one database table. Through this feature, present application facilitates intelligent mapping of data structures into database tables.

In view of at least the foregoing, it is readily apparent that both Mehta and Scott fail to teach or suggest all aspects of the claimed invention. Accordingly, it is respectfully requested that this rejection of independent claims 1, 10, 19, 23 and 29 (and the claims that depend there from) should be withdrawn.

II. Rejection of Claims 8 and 27 Under 35 U.S.C. §103(a)

Claims 8 and 27 stand rejected under 35 U.S.C. §103(a) as being unpatentable over Mehta and Scott as applied to claims above, and further in view of US Publication Number 2004/0143791 issue dot Yuichi Ito, et al. (hereinafter “Ito”). It is respectfully requested that this rejection be withdrawn for at least the following reasons. Mehta, Scott and Ito either alone or in combination fail to teach or suggest all aspects of applicant’s invention as set forth in the subject claims. Ito relates to converting XML code to binary format and does not make up for the aforementioned deficiencies of Mehta and Scott with respect to independent claim 1 (from which claim 8 depend) and independent claim 23 (from which claim 27 depend). Thus it is submitted, the subject invention as recited in claim 8 and 27 is not obvious over the combination of Mehta, Scott and Ito. Accordingly, this rejection should be withdrawn.

CONCLUSION

The present application is believed to be in condition for allowance in view of the above comments and amendments. A prompt action to such end is earnestly solicited.

In the event any fees are due in connection with this document, the Commissioner is authorized to charge those fees to Deposit Account No. 50-1063 [ALBRP330US].

Should the Examiner believe a telephone interview would be helpful to expedite favorable prosecution, the Examiner is invited to contact applicant undersigned representative at the telephone number below.

Respectfully submitted,

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